

The final quarter of 2025 and first quarter of 2026 have seen several significant developments in Australia’s anti-bribery and corruption landscape, which Australian businesses with overseas operations and foreign companies doing business in Australia should have on their radar.

With the absolute liability corporate offence for a failure to prevent foreign bribery now very much in force, this is a good time for directors, general counsel and compliance officers to carefully examine the adequacy of their company’s anticorruption procedures and culture.

To learn more about the corporate offence and the adequate procedures defence, see our previous commentary [here](#).

Taskforce Solaris

At the end of 2025, the Australian Federal Police (AFP) announced that the AFP’s response to foreign bribery will now be managed exclusively by Taskforce Solaris, a new multidisciplinary team focused on preventing, detecting and investigating foreign bribery and grand corruption.

The taskforce has indicated that it will work closely with international and domestic partners to support the enforcement of Australian foreign bribery laws, and signals that the AFP is mobilising key skill sets to detect and enforce the new absolute liability corporate offence for failing to prevent foreign bribery.

Key Indicators of Foreign Bribery

The International Foreign Bribery Taskforce (IFTB) has recently published guidance on key indicators associated with foreign bribery to enable stakeholders to recognise various factors that are commonly present when a transaction or undertaking is tainted by foreign bribery.

The IFTB is made up of the AFP, the US Federal Bureau of Investigations, the UK’s Serious Fraud Office and National Crime Agency, the New Zealand Serious Fraud Office and the Royal Canadian Mounted Police. The key indicators guidance has been collated based on the collective experiences of IFTB members.

The key indicators are conveniently broken down into red flag categories such as conduct, government affiliations, country links, ownership, registration information and other associations. The key indicators can be accessed [here](#).

These are a useful resource in the context of examining a company’s anticorruption procedures, as well as being a utility for a company’s officers and employees to identify possible instances of foreign bribery.

Australia Slips in the Corruptions Perception Index

Transparency International’s leading global indicator of public sector corruption suggests a period of complacency in Australia, as it slips two places to rank 12th on the scale of least corrupt public sectors, down from 10th at the end of 2024. Transparency International specifically identify the absence of a whistleblower protection authority in Australia, and the absence of stricter regulations around lobbying as at least partially causative of this downward trajectory.

The report suggests that this is part of a concerning decline in leadership to tackle corruption in a number of established democracies, including Australia, the US, UK and New Zealand.

The full report can be accessed [here](#).

National Anticorruption Commission (NACC) Joins the Bribery Prevention Network

The Bribery Prevention Network is a public-private partnership that brings together government, business and academia with the shared goal addressing corrupt practices.

The newest member of the Bribery Prevention Network’s Impact Committee is the federal government’s NACC.

Speaking at the UN Convention against Corruption in Doha in December 2025, the National Anticorruption Commissioner, the Honourable Paul Brereton AM RFD SC, praised the Bribery Prevention Network’s efforts in supporting Australian businesses to prevent, detect and address bribery and promote a culture of compliance.

The Bribery Prevention Network provides various resources to Australian businesses, available [here](#).

Conclusion

As is evident, tackling foreign bribery and corruption continues to be a focus in Australia and elsewhere. The AFP's creation of a special taskforce in particular signals a clear intent to utilise the new corporate offence provisions in an effort to satisfy Australia's obligations as a party to the Organisation for Economic Cooperation and Development (OECD) Anti-Bribery Convention. In house legal practitioners in particular should consider the robustness of their governance and risk management procedures to ensure their business does not fall foul in this environment of increasing scrutiny.

Contact

Our practitioners have unique experience conducting independent investigations, as well as defending both domestic and foreign bribery prosecutions, including against corporations.

If you have any concerns or would like to assess whether your business has adequate procedures in place to defend a failure to prevent foreign bribery charge, please contact us.



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